This listing of claims will replace all prior versions, and listings, of claims in the application:

Listing of Claims:

1. (Currently Amended) A method for updating data at a backup system that tracks updates made to a primary system, the method comprising:

creating a first group including a first plurality of update requests, the first plurality of update requests in the first group having an order dependency relative to a second plurality of update requests in a second, subsequent group, with the update requests in each of the first and second groups capable of being processed concurrently and without regard for order relative to one another;

concurrently completing the first plurality of update requests of the first group; and

after concurrently completing the first plurality of update requests, concurrently completing the second plurality of update requests of the second group ~~a subsequent update request~~.

2. (Currently Amended) The method of claim 1, wherein concurrently completing ~~a~~ the second plurality of update requests of the second group ~~subsequent update request~~ includes creating ~~a subsequent~~ the second group.

3. (Currently Amended) The method of claim 1, wherein creating the first group further includes creating a group that includes a plurality of requests initiated at a plurality of applications.

4. (Currently Amended) The method of claim 1, wherein creating the first group further includes updating a count associated with a number of the first plurality of update requests.

5. (Cancelled)

6. (Currently Amended) The method of claim 1, wherein creating the first group further includes updating a status indicative of whether the first group is active.

7. (Currently Amended) The method of claim 1, wherein creating the first group further includes assigning a group number to ~~an~~ each update request of the first plurality of update requests.

8. (Currently Amended) The method of claim 1, wherein concurrently completing the first plurality of update requests further includes issuing an update request of the first plurality of update requests.

9. (Currently Amended) The method of claim 1, wherein creating the first group further includes reading a group number from an update request ~~of the plurality of update requests~~.

10. (Currently Amended) The method of claim 1, wherein concurrently completing the first plurality of update requests further includes holding an update request from the second plurality of update requests that is received prior to completing the first plurality of update requests ~~the subsequent update requests~~.

11. (Currently Amended) The method of claim 10 ~~1~~, wherein concurrently completing the second plurality of update requests ~~subsequent update request~~ further includes releasing a hold on the ~~subsequent~~ held update request from the second plurality of update requests.

12. (Currently Amended) The method of claim 1, wherein creating the first group, concurrently completing the first plurality of update requests and concurrently

completing the second plurality of update requests ~~subsequent update request~~ further comprises creating the first group, completing the first plurality of update requests and completing the second plurality of update requests ~~subsequent update request~~ on ~~a~~ the primary system.

13. (Currently Amended) The method of claim 1, wherein creating the first group, completing the first plurality of update requests and completing the second plurality of update requests ~~subsequent update request~~ further comprises creating the first group, completing the first plurality of update requests and completing the second plurality of update requests ~~subsequent update request~~ on the backup system.

14. (Currently Amended) A method for updating data at a backup system that tracks updates made to a primary system, the method comprising:

synchronously processing a plurality of groups of update requests, the plurality of groups having an order dependency relative to one another, with the update requests in each group being capable of being processed concurrently and without regard for order relative to one another; and

asynchronously processing the update requests in each group.

15. (Original) The method of claim 14, wherein processing the plurality of update requests further includes holding an update request of another group of the plurality of groups.

16. (Original) The method of claim 14, wherein processing the groups further includes assigning a group number to an update request of the plurality of update requests.

17. (Currently Amended) An apparatus comprising:

a processor; and

a ~~computer-readable medium~~ recordable type media encoded with program code communicating with the processor and configured to update data at a backup system that tracks updates made to a primary system ~~process a plurality of update requests having an order dependency~~ by initiating creation of a first group including a ~~portion of the~~ first plurality of update requests, the first plurality of update requests in the first group having an order dependency relative to a second plurality of update requests in a second, subsequent group, with the update requests in each of the first and second groups capable of being processed concurrently and without regard for order relative to one another;

concurrently initiating completion of the first ~~portion of the~~ plurality of update requests of the first group; [[,]] and after concurrently initiating the completion of the first ~~portion of the~~ plurality of update requests, concurrently initiating completion of the second plurality of update requests of the second group ~~a subsequent update request~~.

18. (Currently Amended) The apparatus of claim 17, wherein the ~~computer-readable medium~~ recordable type media encoded with the program code resides on at least one of a backup system and a primary system, and the backup system is peripheral from the primary system.

19. (Currently Amended) The apparatus of claim 17, wherein the ~~computer-readable medium~~ recordable type media encoded with the program code initiates creating ~~a subsequent~~ the second group.

20. (Currently Amended) The apparatus of claim 17, wherein the first group includes a plurality of requests initiated at a plurality of applications.

21. (Currently Amended) The apparatus of claim 17, wherein the ~~computer-readable medium~~ recordable type media encoded with the program code initiates updating a count associated with a number of the first plurality of update requests.

22. (Currently Amended) The apparatus of claim 17, wherein the ~~computer-readable medium~~ recordable type media encoded with the program code initiates updating a status indicative of whether the first group is active.

23. (Currently Amended) The apparatus of claim 17, further comprising a memory accessible to the ~~computer readable medium~~ recordable type media encoded with the program code.

24. (Currently Amended) The apparatus of claim 17, wherein the ~~computer-readable medium~~ recordable type media encoded with the program code initiates assigning a group number to ~~an~~ each update request of the first plurality of update requests.

25. (Currently Amended) The apparatus of claim 17, wherein the ~~computer-readable medium~~ recordable type media encoded with the program code initiates issuing an update request of the first plurality of update requests.

26. (Currently Amended) The apparatus of claim 17, wherein the ~~computer-readable medium~~ recordable type media encoded with the program code initiates reading a group number from an update request of the first plurality of update requests.

27. (Currently Amended) The apparatus of claim 17, wherein the ~~computer-readable medium~~ recordable type media encoded with the program code initiates holding an update request from the second plurality of update requests that is received prior to completing the first plurality of update requests ~~the subsequent update request~~.

28. (Currently Amended) The apparatus of claim 27 ~~17~~, wherein the ~~computer-readable medium~~ recordable type media encoded with the program code initiates

releasing a hold on the ~~subsequent~~ held update request from the second plurality of update requests.

29. (Currently Amended) The apparatus of claim 17, wherein the ~~computer-readable medium~~ recordable type media encoded with the program code resides on ~~a~~ the backup system.

30. (Currently Amended) The apparatus of claim 17, wherein the ~~computer-readable medium~~ recordable type media encoded with the program code resides on ~~a~~ the primary system.

31. (Currently Amended) An apparatus comprising:

a processor; and

a ~~computer-readable medium~~ recordable type media encoded with program code in communication with the processor configured to update data at a backup system that tracks updates made to a primary system by initiating the synchronous processing of a plurality of groups of update requests, the plurality of groups having an order dependency relative to one another, with the update requests in each group being capable of being processed concurrently and without regard for order relative to one another, and the program code initiating the asynchronous processing of the update requests in each group.

32. (Currently Amended) A program product, comprising:

program code in communication with at least one of a primary and backup system, the program code configured to initiate creation of a first group including a first plurality of update requests, the first plurality of update requests in the first group having an order dependency relative to a second plurality of update requests in a second group, with the update requests in each of the first and second groups capable of being processed concurrently and without regard for order relative to one another, ~~and~~ the program code

further configured to concurrently initiate completion of the first plurality of update requests, and after concurrently initiating the completion of the first plurality of update requests, ~~the program code being further configured to~~ concurrenlty initiate completion of the second plurality of update requests of the second group ~~a subsequent update request~~; and

a recordable type, signal bearing medium bearing the program code.

33. (Cancelled)

34. (Currently Amended) A program product, comprising:

program code in communication with at least one of a primary and backup system, the program code configured to initiate synchronously processing a plurality of groups of update requests, the plurality of groups having an order dependency relative to one another, with the update requests in each group being capable of being processed concurrently and without regard for order relative to one another, and the program code configured to initiate asynchronously processing the update requests in each group; and

a recordable type, signal bearing medium bearing the program code.

35. (Cancelled)

36. (Currently Amended) The method of claim 1, further comprising after completing the first plurality of update requests, arranging the second plurality of update requests ~~of the group~~ according to the order dependency.

37. (New) The method of claim 1, wherein each update request is generated by an application from among a plurality of applications, and wherein the first group includes a first update request generated by a first application among the plurality of applications, the method further comprising creating the second group in response to the first application generating a second update request.